

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Oumou Staton	:	
A/K/A Oumou Thomas	:	Chapter 13
	Debtors	:
	:	Bankruptcy No. 17-11141 AMC
Oumou Staton	:	
A/K/A Oumou Thomas	:	
	Movant	:
	:	
Bank of America, N.A	:	
	Respondent	:

**RESPONSE OF BANK OF AMERICA, N.A TO MOTION TO RECONSIDER ORDER
MODIFYING AUTOMATIC STAY**

Respondent, Bank of America, N.A by and through its attorneys, Phelan Hallinan

Diamond & Jones, LLP, hereby responds to Motion to Reconsider Order Modifying Automatic Stay and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted only that if funds are tendered that are insufficient to completely cure the arrearage, they will be returned.
8. No Response necessary.
9. The amount need to cure thru February 2018 is \$3,234.00

WHEREFORE, Respondent, Bank of America, N.A. respectfully requests that this Honorable Court deny Motion to Reconsider Order Modifying Automatic Stay in its entirety.

Respectfully submitted,

Date: March 5, 2018

/s/ Jerome Blank, Esquire
Jerome Blank, Esq., Id. No.49736
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
Phone Number: 215-563-7000 Ext 31625
Fax Number: 215-568-7616
Email: jerome.blank@phelanhallinan.com